



LAW OFFICES
LIMITED LIABILITY PARTNERSHIP

NEW YORK, NY
LOS ANGELES, CA
SAN FRANCISCO, CA
WILMINGTON, DE
HOUSTON, TX

780 THIRD AVENUE
34th FLOOR
NEW YORK
NEW YORK 10017-2024

TELEPHONE: 212.561.7700
FACSIMILE: 212.561.7777

LOS ANGELES
10100 SANTA MONICA BLVD.
13th FLOOR
LOS ANGELES
CALIFORNIA 90067-4003

TELEPHONE: 310.277.6910
FACSIMILE: 310.201.0760

SAN FRANCISCO
ONE MARKET PLAZA, SPEAR TOWER
40th FLOOR, SUITE 4000
SAN FRANCISCO
CALIFORNIA 94105-1020

TELEPHONE: 415.263.7000
FACSIMILE: 415.263.7010

DELAWARE
919 NORTH MARKET STREET
17th FLOOR
P.O. BOX 8705
WILMINGTON
DELAWARE 19899-8705

TELEPHONE: 302.652.4100
FACSIMILE: 302.652.4400

TEXAS
440 LOUISIANA STREET
SUITE 900
HOUSTON
TEXAS 77002-1062

TELEPHONE: 713.691.9385
FACSIMILE: 713.691.9407

James I. Stang

October 20, 2023

310-277-6910
jstang@pszjlaw.com

VIA E-FILING

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

**Re: Re: In re. The Roman Catholic Diocese of
Rockville Centre, New York Case No. 20-12345**

Dear Judge Glenn:

The Court should immediately order the removal of the Diocese's Letter¹ from the docket as it violates Section 1125 and is a breach of the Court's mediation order.² The Committee reserves the right to seek further redress and requests that the Court consider this violation and breach as the first calendar item on the October 23 hearing agenda.

The Mediation Order prohibited the Committee and the other mediation participants from previously divulging the offer in the Letter and continues to prohibit the Committee from sharing the reasons for its rejection of such offer. By disclosing confidential mediation information and effectively soliciting all survivors, the Debtor is making a desperate last ditch effort to drive a wedge between clergy sexual abuse victims and their representatives. The Debtor's ploy has the additional probability of causing irreparable

¹ *Letter of Corinne Ball dated October 19, 2023* [Docket No. 2590] (the "Letter").

² See "*Order Appointing a Mediator*" [Docket No. 794] ("[N]o person or Party may in any... (hearing held by this Court in the Debtor's chapter 11 case or related proceedings) disclose, divulge or introduce as evidence any aspect of the Mediation, including, but not limited to: (a) any statement, admission or proposal made by the Mediator, any of the Parties or others during the Mediation process....").



The Honorable Martin Glenn
October 20, 2023
Page 2

injury to survivors first learning of the mediation offer in the October 19 edition of *Newsday*. These victim representatives, including the Committee members, respect the confidentiality of the mediation and orders of the Court and thereby are restrained from explaining that while the Diocese's mediation offer may be the "last" offer, it is by no means the "best" option.

Respectfully Submitted,

James I. Stang